DRAGON PRODUCTS COMPANY
Box 191, U.S. Route 1 • Thomaston, Maine 04861

Certified Mail Receipt No. 3515

September 13, 2016

Ms. Jane Gilbert
Maine Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, Maine 04333

Re: Dragon Products Company, LLC
Quarterly Update for Hydrogen Chloride Compliance Extension

Dear Ms. Gilbert:

Dragon Products Company, LLC (Dragon) is providing the Maine Department of Environmental Protection (Department) supplemental information regarding the commercial availability of National Institute of Standards and Technology (NIST) traceable, low concentration, calibration gases for the operation of Dragon's hydrogen chloride (HCl) continuous emission monitoring system (CEMS). This submittal is pursuant to the one-year compliance extension for HCl emission limits granted by the Department to Dragon on June 9, 2015.

On May 12, 2015 Dragon requested a one-year compliance date extension of the portland cement hydrogen chloride (HCl) emission limit under 40 CFR §63 Subpart LLL due to the lack of commercially available NIST traceable low range calibration gases. NIST traceable gases are required to confirm CEMS are accurately monitoring emissions through performance audits and daily quality assurance procedures required under the performance testing and quality assurance policies developed by the U.S. Environmental Protection Agency (EPA).

Hydrogen chloride calibration gases, in the concentrations required for Dragon's Fourier Transform Infrared Spectroscopy (FTIR) CEMS, are now commercially available. Dragon has purchased compliant HCl calibration gas for daily quality assurance procedures required for monitoring emissions. Dragon began compliance monitoring of HCl emissions on September 9, 2016.

If you have any questions regarding Dragon's request please contact me at (207) 593-0147.

Sincerely,

Michael W. Martunas
Environmental Compliance Manager
Dragon Products Company, LLC

c.c Ms. Susan Lancey (EPA Region 1)
Mr. Stephen P. Holt, P.E. (Dragon)